

Exhibit C

Sarah R. LaFreniere

From: Sarah R. LaFreniere
Sent: Friday, December 3, 2021 7:40 AM
To: Atkins, Alden L.; Megan E. Jones; Andrew Marovitz; John Terzaken (john.terzaken@stblaw.com); Adair, Jonathan N.; Warren, Zachary (EXTERNAL CONTACT); Wesley, Lincoln; Jhunjhnuwala, Trisha; Laytin, Daniel E.; Nowak, Richard
Cc: Fatima Brizuela; Jason Hartley; MDI; William Pietragallo; Peter St. Tienne Wolff; Rebeca H. Miller
Subject: RE: MDI//Plaintiffs' Search Terms

Alden,

We are available at the times you suggest below. We will send around a dial in for Monday, and reach out to Judge Francis regarding his availability for Thursday.

Kind regards,
Sarah

SARAH R. LAFRENIERE

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From: Atkins, Alden L. <AAtkins@velaw.com>
Sent: Wednesday, December 1, 2021 1:42 PM
To: Megan E. Jones <mjones@hausfeld.com>; Andrew Marovitz <AMarovitz@mayerbrown.com>; John Terzaken (john.terzaken@stblaw.com) <john.terzaken@stblaw.com>; Adair, Jonathan N. <jonathan.adair@kirkland.com>; Warren, Zachary (EXTERNAL CONTACT) <zwarren@wc.com>; Wesley, Lincoln <lwesley@velaw.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Laytin, Daniel E. <dlaytin@kirkland.com>; Nowak, Richard <RNowak@mayerbrown.com>
Cc: Sarah R. LaFreniere <SLaFreniere@hausfeld.com>; Fatima Brizuela <brizuela@hartleyllp.com>; Jason Hartley <hartley@hartleyllp.com>; MDI <mdi@hausfeld.com>; William Pietragallo <WP@Pietragallo.com>; Peter St. Tienne Wolff <PSW@Pietragallo.com>; Rebeca H. Miller <RHM@Pietragallo.com>
Subject: RE: MDI//Plaintiffs' Search Terms

Megan:

Correction—Defendants are available on December 9 during Judge Francis's availability from 11-2. I am reminded that there are conflicts on December 10.

From: Atkins, Alden L.

Sent: Wednesday, December 1, 2021 1:29 PM

To: 'Megan E. Jones' <mjones@hausfeld.com>; Andrew Marovitz <AMarovitz@mayerbrown.com>; John Terzaken (john.terzaken@stblaw.com) <john.terzaken@stblaw.com>; Adair, Jonathan N. <jonathan.adair@kirkland.com>; Warren, Zachary (EXTERNAL CONTACT) <zwarren@wc.com>; Wesley, Lincoln <lwesley@velaw.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Laytin, Daniel E. <dlaytin@kirkland.com>; Nowak, Richard <RNowak@mayerbrown.com>

Cc: Sarah R. LaFreniere <SLaFreniere@hausfeld.com>; Fatima Brizuela <brizuela@hartleyllp.com>; Jason Hartley <hartley@hartleyllp.com>; MDI <mdi@hausfeld.com>; William Pietragallo <WP@Pietragallo.com>; Peter St. Tienne Wolff <PSW@Pietragallo.com>; Rebeca H. Miller <RHM@Pietragallo.com>

Subject: RE: MDI//Plaintiffs' Search Terms

Megan:

Thank you for your email. I was just preparing an email to you.

The Defendants are still analyzing your lengthy search terms. We suggest a meet and confer on Monday, December 6 at 5:00 pm ET.

The Defendants are available for a conference with Judge Francis on December 10 during his available window of 10:30 am-3:00 pm ET.

Best regards,

Alden

From: Megan E. Jones <mjones@hausfeld.com>

Sent: Wednesday, December 1, 2021 1:23 PM

To: Atkins, Alden L. <AAtkins@velaw.com>; Andrew Marovitz <AMarovitz@mayerbrown.com>; John Terzaken (john.terzaken@stblaw.com) <john.terzaken@stblaw.com>; Adair, Jonathan N. <jonathan.adair@kirkland.com>; Warren, Zachary (EXTERNAL CONTACT) <zwarren@wc.com>; Wesley, Lincoln <lwesley@velaw.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Laytin, Daniel E. <dlaytin@kirkland.com>; Nowak, Richard <RNowak@mayerbrown.com>

Cc: Sarah R. LaFreniere <SLaFreniere@hausfeld.com>; Fatima Brizuela <brizuela@hartleyllp.com>; Jason Hartley <hartley@hartleyllp.com>; MDI <mdi@hausfeld.com>; William Pietragallo <WP@Pietragallo.com>; Peter St. Tienne Wolff <PSW@Pietragallo.com>; Rebeca H. Miller <RHM@Pietragallo.com>

Subject: Re: MDI//Plaintiffs' Search Terms

[EXTERNAL]

Dear Counsel:

Following up on your availability to meet and confer on search terms in the coming days, as well as your availability to set up a call with Judge Francis.

Thanks,
Megan

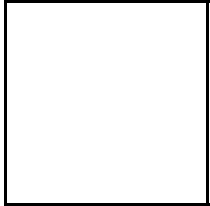
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From: "Atkins, Alden L." <AAtkins@velaw.com>

Date: Wednesday, November 24, 2021 at 10:34 AM

To: Megan Jones <mjones@hausfeld.com>, Andrew Marovitz <AMarovitz@mayerbrown.com>, "John Terzaken (john.terzaken@stblaw.com)" <john.terzaken@stblaw.com>, "Adair, Jonathan N." <jonathan.adair@kirkland.com>, "Warren, Zachary (EXTERNAL CONTACT)" <zwarren@wc.com>, "Wesley, Lincoln" <lwesley@velaw.com>, "Jhunjhnuwala, Trisha" <tjhunjhnuwala@wc.com>, "Laytin, Daniel E." <dlaytin@kirkland.com>, "Nowak, Richard" <RNowak@mayerbrown.com>

Cc: "Sarah R. LaFreniere" <SLaFreniere@hausfeld.com>, Fatima Brizuela <brizuela@hartleyllp.com>, Jason Hartley <hartley@hartleyllp.com>, MDI <mdi@hausfeld.com>, William Pietragallo <WP@Pietragallo.com>, "Peter St. Tienne Wolff" <PSW@Pietragallo.com>, "Rebeca H. Miller" <RHM@Pietragallo.com>

Subject: RE: MDI//Plaintiffs' Search Terms

Megan:

Thank you for your email. As you know, Defendants sent their search terms to plaintiffs about a month ago, and the Excel versions almost three weeks ago. You first raised the search term issue during the status conference with the Court more than a week ago. And still we did not receive your proposal until late at night on Tuesday before the Thanksgiving holiday. Your proposal appears to include hundreds of individual search terms (before considering the permutations of the wild cards) that you want defendants to add. With the holiday and travel, the Defendants' teams will not be able to evaluate these search terms until next week. We will be in touch with you next week about arranging a call, which we anticipate will be late next week or early the following week.

In the meantime, please send us an Excel version of your proposed search terms to facilitate our review.

Best wishes for a happy Thanksgiving.

Alden

Alden L. Atkins

Partner



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From: Megan E. Jones <mjones@hausfeld.com>

Sent: Tuesday, November 23, 2021 10:05 PM

To: Andrew Marovitz <AMarovitz@mayerbrown.com>; John Terzaken (john.terzaken@stblaw.com) <john.terzaken@stblaw.com>; Adair, Jonathan N. <jonathan.adair@kirkland.com>; Warren, Zachary (EXTERNAL CONTACT) <zwarren@wc.com>; Atkins, Alden L. <AAtkins@velaw.com>; Wesley, Lincoln <lwesley@velaw.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Laytin, Daniel E. <dlaytin@kirkland.com>; Nowak, Richard <RNowak@mayerbrown.com>

Cc: Sarah R. LaFreniere <SLaFreniere@hausfeld.com>; Fatima Brizuela <brizuela@hartleyllp.com>; Jason Hartley <hartley@hartleyllp.com>; MDI <mdi@hausfeld.com>; William Pietragallo <WP@Pietragallo.com>; Peter St. Tienne Wolff <PSW@Pietragallo.com>; Rebeca H. Miller <RHM@Pietragallo.com>

Subject: MDI//Plaintiffs' Search Terms

[EXTERNAL]

Dear Counsel:

Please find attached list of disputed search terms. The terms are divided into four groups:

1. Terms that no Defendant has agreed to run. Plaintiffs request that Defendants run each of these search strings.
2. Terms that defendants have agreed to run in a modified format. Plaintiffs have proposed different versions of those string and request Defendants run Plaintiffs' version.
3. Terms certain Defendants have not agreed to run, unless indicated as a "Defendant at Issue" the other Defendants have agreed to run these searches. Plaintiffs believe all Defendants should run these terms.
4. Terms Plaintiffs believe should be run unless Defendants to agree to produce full calendars.

As with prior iterations of the search terms, the search term groups (MDI or TDI 1-3, Producers 1-8, and Cost Inputs 1-2), are listed in the final exhibit. We do not believe that there is any dispute over the search term groups.

Certain Defendants' recent disclosures of search terms provided different formatting than prior indications. For example, BASF and Covestro's terms often exclude quotation marks. Likewise, Dow and Wanhua are missing the term "OR" in string 81.a. It is Plaintiffs understanding that minor syntax modifications such as

these are immaterial to the performance of the search. Please let us know if we are mistaken. In a few instances, the first letter “c” is missing from the word “capacity” or “capacit*” – we assume that was a typo that will be corrected, but please let us know if we are mistaken.

For the avoidance of any doubt, Plaintiffs make this proposal with the understanding that terms Defendants have provided to Plaintiffs will be run as indicated.

Please let us know when you’d like to discuss, and we will arrange a call.

Thanks, and best wishes for a Happy Thanksgiving.

Megan

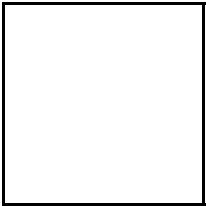
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Thank You.
